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8 **Attorney for Defendant**
9 **Darrell Braithwaite**

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11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 (Honorable William McCurine)

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 DARRELL BRAITHWAITE,

18 Defendant.

Criminal Case No. 08-mj-1821

**JOINT MOTION TO
MODIFY TRAVEL**

19 **COMES NOW** the defendant DARRELL BRAITHWAITE, through his counsel,
20 STEPHEN P. WHITE, and the plaintiff, UNITED STATES OF AMERICA, through its counsel,
21 KAREN P. HEWITT, United States Attorney, and GEORGE MANAHAN, Assistant United
22 States Attorney, and jointly move the court that the conditions of Supervised Release previously
23 set for defendant be modified as follows:

24 That the travel restriction for defendant DARRELL BRAITHWAITE be enlarged to
25 permit the defendant to travel to New York beginning on Thursday, July 31, 2008 through
26 Wednesday, August 6, 2008 to visit with his ill father who lives in New York. Defendant
27 Braithwaite will be staying at a relatives home located in New York.

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1 Mr. Braithwaite has informed the United States Pre-Trial Services officer, Cynthia Ornelas in
2 San Diego and she has no objection to the Request made herein. Defendant is in compliance with all
3 other terms and conditions of his Supervised Release and has not suffered any violations.

4 This stipulation acknowledges that the Assistant United States Attorney has no objection to the
5 modification and enlargement of defendant's travel, as set forth above.

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7 Dated: July 16, 2008

/s/Stephen P. White
STEPHEN P. WHITE
Attorney for Defendant
Darrell Braithwaite

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10 Dated: July 16, 2008

UNITED STATES OF AMERICA

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13 /s/George Manahan
GEORGE MANAHAN
Assistant U.S. Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2008, I electronically filed Defendants Joint Motion to Travel with the Clerk of the Court using the CM/ECF system. I thereby served the opposing party by e-filing to the Office of the Clerk, which will serve the parties listed on the electronic service list for this case.

Respectfully submitted,

DATED: July 16, 2008

/s/Stephen P. White
STEPHEN P. WHITE, ESQ.
Attorney for Defendant